

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.

v.

RICK PERRY, ET AL.

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CIVIL ACTION NO. 2:03-CV-354

Consolidated

SWORN DECLARATION OF LETICIA VAN DE PUTTE

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is Leticia Van de Putte. I reside at 1616 W. Mulberry, San Antonio, Texas, 78721 in Bexar County, Texas. I am elected official in Bexar County; I hold the position of state senator.
2. As an elected official and a community leader who represents the significant interests of Bexar County, I am writing this Declaration to detail serious concerns and objections that I have to the congressional redistricting plan proposed by Perry and other State Defendants numbered Plan 1418C, as they relate to the county.
3. Traditionally, the South side of Bexar County has been united in a single congressional district where it has a significant, if not dominant, influence on the Member of Congress. Unlike other proposed plans before the Court, Plan 1418C would split the South side of San Antonio and Bexar County, moving almost 128,000 residents, including 67,280 Hispanics and 29,750 African Americans, out of District 28 into a proposed District 25 that is strongly anchored in the Rio Grande Valley.
4. Ironically, the Perry map would split the community at a time when economic development projects like the new Toyota plant and the new Texas A & M campus are underway in District 28 near the plan's proposed boundary with District 25. These projects will serve to further unite the south side of San Antonio in the way the Brooks City Center, which is also located in District 25 near the proposed 25-28 border along Military Drive, has traditionally been a economic hub for the South side. Finally, the Mission Trails historic project is focused along the San Antonio River, which is literally the District 25-28 boundary in some places of the proposed state plan. The plan as drawn by Perry and other state officials is inconsistent with and harmful to these economic interests, in my opinion.
5. Additionally, Perry Plan 1418 separates neighborhoods that have common interests. Near the center of the city, this plan would split off the heavily Hispanic Riverside community, an area with an extremely high density of federal low

EXHIBIT

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income housing, and place it in District 25, which is based in the Rio Grande Valley. Likewise, the predominantly African American community to the east of downtown San Antonio would be placed in the same Valley-dominated District 25. And farther to the south, the heavily Hispanic Harlandale community would be split from the Highland Hills community, an area where rapid Hispanic growth is underway as families grow and move from neighboring Hispanic neighborhoods.

6. The bottom line here is simple: the Perry and other State Defendant's Plan 1418C shows utter disregard for the South side community in San Antonio. It is clear that there is no need to split the South side community in this way. I understand that other proposed redistricting remedies make it clear that the South Side community can remain united in a single congressional district where it will have a significant impact on the representation we have in Congress.

I declare under penalty of perjury that the foregoing is true and correct.

This 19th day of July, 2006.

Leticia VandePutte